

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

Scher & Isenberg, L.L.C.  
By: **Martin I. Isenberg, Esquire**, I.D. 791987  
200 Haddonfield-Berlin Road  
High Ridge Commons - Suite 200  
Gibbsboro, New Jersey 08026  
Telephone Number: (856) 782-8222  
Facsimile: (856) 782-8825  
Email: [misenbergesq@comcast.net](mailto:misenbergesq@comcast.net)  
Attorney for Creditor, Laura Williams

In Re:

Laura A. Williams, Debtor

Case No.: 18-10714-JNP

Chapter: 13

Hearing Date: \_\_\_\_\_

Judge: Jerrold N. Poslusny

**MOTION FOR RECONSIDERATION**

I, Martin I. Isenberg, Esquire, Attorney for the Debtor, Laura A. Williams, files this instant Motion for Reconsideration and, in support thereof, avers the following:

1. On October 29, 2021, Creditor, New Jersey Housing and Mortgage Finance Agency, c/o Cenlar FSB, filed a Motion to Vacate Stay.
2. A response from the Debtor was due by Friday, November 12, 2021.
3. A draft of the Debtor's response was dictated on November 11, 2021 by the undersigned counsel.
4. Unfortunately, my secretary called out ill on November 12, 2021 and was treated at Cooper Hospital and unable to prepare Debtor's response.

5. As such, Debtor's response was filed on Monday, November 15, 2021, under Docket #65, see **Exhibit A**.

6. On November 16, 2021, after Debtor's filing, an Order was entered vacating the stay.

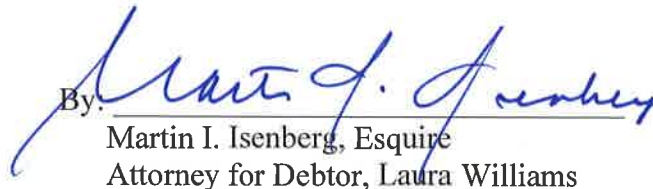
7. The undersigned therefore requests that the Order Vacating Stay be vacated, that he be permitted to file Debtor's response out of time and for the Court to set this matter down for disposition.

**WHEREFORE**, Counsel herein is requesting that the Court vacate the Order lifting the stay, permit the Debtor to file her response out of time, and set this matter down for disposition.

Respectfully Submitted,

SCHER & ISENBERG, L.L.C.

By.

  
Martin I. Isenberg, Esquire  
Attorney for Debtor, Laura Williams

Date:

11/17/2021

# EXHIBIT

## A

**By: Martin I. Isenberg, Esquire**  
Atty ID No.: 000791987  
Scher & Isenberg, L.L.C.  
200 Haddonfield-Berlin Road  
High Ridge Commons – Suite 200  
Gibbsboro, New Jersey 08026  
Telephone: (856) 782-8222  
Facsimile: (856) 782-8825  
Email: [misenbergesq@comcast.net](mailto:misenbergesq@comcast.net)  
Attorney for Debtor, Laura Williams

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IN RE:	:	UNITED STATES BANKRUPTCY COURT
	:	DISTRICT OF NEW JERSEY
	:	
LAURA WILLIAMS	:	Case No.: 18-10714-JNP
	:	
	:	Judge: Jerrold N. Poslusny, Jr.
	:	
	:	Chapter 13

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**DEBTOR'S OBJECTION TO CREDITOR'S REQUEST FOR  
CERTIFICATION OF DEFAULT**

1. On January 12, 2018, the Debtor herein filed a Chapter 13 Petition with this Court.
2. Along with the Chapter 13 Petition, a Plan for resolution of debts was also proposed.
3. Subsequently, on June 1, 2018, a Second Modified Chapter Plan was filed with the Court and approved.
4. After filing the first Plan, the Debtor made monthly payments to the Trustee.
5. On April 6, 2020, the Debtor filed a Stipulation along with the Trustee adjusting the Trustee payments requiring the Debtor to pay \$460.00 per month for an additional 34 months. At that time, Debtor had paid \$10,760.09 toward the Plan.
6. A large part of the Plan involved arrearages of approximately \$18,000.00 owed to New Jersey Housing and Mortgage Finance Agency, now identified as Cenlar, to pay back Pre-Petition arrears.
7. As of September 1, 2021, \$14,108.59 has been paid to Cenlar by the Bankruptcy Court, see **Exhibit A**.

8. In addition, under the Plan approved by the Court, the Debtor was required to make monthly payments to Cenlar. These payments have been made and **Exhibit A** indicates that there is no principal and interest owed.

9. The Debtor has owned this property since 1991.

10. Shortly, after receiving the loan statement from Cenlar in September of 2021 stating \$400.00 was owed, the Debtor was notified that she was in arrears to the tune of \$2,459.63 which is the subject of the Motion to Vacate the Stay by Cenlar.

11. Once the Motion was received, the undersigned counsel contacted Cenlar and was provided with a statement of corporate advances which were incurred from the period of September 27, 2016 to October 21, 2020, see **Exhibit B**.

12. It would appear that the arrears that were listed on the Chapter 13 Bankruptcy Plan from Cenlar would have included in the amount of money at the time of the Bankruptcy Plan. In addition, there are post-petition charges two in the amount of \$2,000.00 each involving "Safeguard" and the like. See **Exhibit C**.

13. It is unclear to the Debtor as to how these charges have been incurred as she has lived in this property for the last 30 years and charges of \$2,000.00 on two different occasions for restoration seem to be excessive and unwarranted.

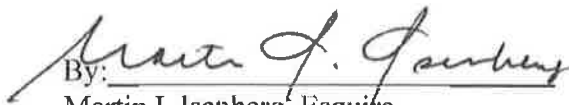
14. As such, the Debtor is requesting a full audit of her account.

15. In order to prevent the stay from being lifted, the Debtor has nevertheless paid \$1,726.55 (per statements with Cenlar – see **Exhibit D**) but under reservation of rights to avoid any further action by this Court.

16. Therefore, I, on behalf of the Debtor, am requesting that the Motion be Denied and that Cenlar provide a full accounting and an explanation as to its determination of both their calculation of Pre-Petition arrears and Post-Petition obligations.

Scher & Isenberg, L.L.C.

Date: 11/15/2021

By:   
Martin I. Isenberg, Esquire  
Attorney for Debtor, Laura Williams

# EXHIBIT

## A

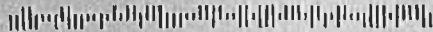


PO Box 77404  
Ewing, NJ 08628  
STATEMENT ENCLOSED

## Loan Statement

Page 1 of 1

0573592 000001134 09C051 0062530 Y2 1A7043 -D P1  
JOHN P WILLIAMS  
LAURA A WILLIAMS  
416 WESLEY AVE  
Pitman NJ 08071-2519



Statement Date: 09/01/21  
Account Number: 0039956651  
Payment Date: 10/01/21  
Payment Amount: \$400.00

### Contact Us

Customer Service/Pay By Phone: 800-223-6527  
Website: www.loanadministration.com

\*Qualified Written Requests, notifications of error, or requests for information concerning your loan must be directed to PO Box 77423 Ewing NJ 08529

**Bankruptcy Message**  
Our records show that you are a debtor in bankruptcy. We are sending this statement to you for informational and compliance purposes only. It is not an attempt to collect a debt against you.  
If your bankruptcy plan requires you to send your regular monthly mortgage payments to the Trustee, you should pay the Trustee instead of us. Please contact your attorney or the Trustee if you have questions.  
If you want to stop receiving statements, write to us.

Account Information	
Property Address	416 WESLEY AVE PITMAN, NJ 08071-0000
Outstanding Principal	\$1,340.21
Interest Rate	8.7000%
Prepayment Penalty	NONE

### Explanation of Payment Amount (Post-Petition Payment)

Principal	\$0.00
Interest	\$0.00
Escrow (for Taxes and Insurance)	\$0.00
Other	\$0.00
Regular Monthly Payment*	\$0.00
Total Fees & Charges Since Last Statement	\$0.00
Past Unpaid Amount	\$400.00
<b>Total Payment Amount</b>	<b>\$400.00</b>

\*The payment amount does not include any amount that was past due before you filed for bankruptcy but may include amounts required pursuant to a court order in your bankruptcy case.

### Transaction Activity (08/03/2021 to 09/01/2021)

Date	Effective Date	Description	Charges	Payments
08/12/21		CITY TAX		\$1,281.42
08/13/21		HAZARD INSURANCE		\$1,471.00
08/19/21	08/19/21	PARTIAL/UNAPPLIED PAYMT		\$421.36
08/20/21		FEE - PROPERTY INSPECT	\$15.00	

### Past Payments Breakdown

	Paid Since Last Statement	Paid Year to Date
Principal	\$479.42	\$4,192.60
Interest	\$13.19	\$240.89
Escrow (Taxes and Insurance)	\$552.93	\$4,751.82
Other	\$0.00	\$0.00
*Fees	\$0.00	\$0.00
*Unapplied Funds	-\$624.18	\$1,231.14
<b>Total</b>	<b>\$421.36</b>	<b>\$10,416.45</b>

### Important Messages

We may not have received all of your mortgage payment due since you filed for bankruptcy.  
This statement may not show recent payments you sent to the Trustee that the Trustee has not yet forwarded to us. Please contact your attorney or Trustee if you have questions.  
\*Unapplied Funds: Any partial payments included here are not applied to your mortgage, but instead are held in one or more separate suspense accounts. Once we receive funds equal to a full monthly payment, we will apply those funds to your mortgage.  
\*Fees: If your Chapter 13 plan requires you to pay interest on the arrearage being paid through the plan, such interest amount shall be included in this section.

### Summary of Amounts Past Due Before Bankruptcy Filing (Pre-Petition Arrearage)

Paid Since Last Statement	\$421.36
Total Paid During Bankruptcy	\$14,108.59
<b>Current Balance</b>	<b>\$4,099.72</b>

This box shows amounts that were past due when you filed for bankruptcy. It may also include other allowed amounts on your mortgage loan. The Trustee is sending us the payments shown here. These are separate from your regular monthly mortgage payment.

# **EXHIBIT**

## **B**



Corporate Advance \$8,973.78

DATE	AMOUNT	Vendor	Inv #	Desription
9/27/2016	125.00	OLDRPBLCTI		TITE
11/21/2016	16.25	SAFEGUARD		PINS
4/25/2017	-141.25			XPAY
5/23/2017	16.25	SAFEGUARD		PINS
6/23/2017	16.25	SAFEGUARD		PINS
7/19/2017	75.00	SAFEGUARD		PROP
7/19/2017	500.00	SAFEGUARD		PROP
7/20/2017	16.25	SAFEGUARD		PINS
8/21/2017	16.25	SAFEGUARD		PINS
9/22/2017	16.25	SAFEGUARD		PINS
10/23/2017	16.25	SAFEGUARD		PINS
11/22/2017	75.00	PUL54		ATTC
11/22/2017	630.00	PUL54		ATTC
11/22/2017	91.74	PUL54		ATTC
11/22/2017	40.00	PUL54		ATTC
11/22/2017	250.00	PUL54		ATTC
11/22/2017	50.00	PUL54		ATTC
11/22/2017	441.38	PUL54		ATTO
11/24/2017	16.25	SAFEGUARD		PINS
1/12/2018	16.25	SAFEGUARD		PINS
1/19/2018	35.00	PUL54		ATTC
1/19/2018	246.06	PUL54		ATTC
1/19/2018	50.00	PUL54		
1/19/2018	16.25	SAFEGUARD		PINS
1/31/2018	6.58	PUL54		
1/31/2018	102.09	PUL54		ATTC
2/23/2018	16.25	SAFEGUARD		PINS
3/26/2018	16.25	SAFEGUARD		PINS
3/30/2018	11.18	PUL54		ATTC
4/26/2018	16.25	SAFEGUARD		PINS
5/25/2018	16.25	SAFEGUARD		PINS
6/1/2018	400.00	PUL54		ATTB
6/25/2018	16.25	SAFEGUARD		PINS
7/30/2018	16.25	SAFEGUARD		PINS
8/31/2018	16.25	SAFEGUARD		PINS
10/2/2018	16.25	SAFEGUARD		PINS
10/31/2018	16.25	SAFEGUARD		PINS
11/30/2018	1,000.00	SAFEGUARD		PROP
12/19/2018	16.25	SAFEGUARD		PINS
1/22/2019	16.25	SAFEGUARD		PINS
2/19/2019	16.25	SAFEGUARD		PINS
6/3/2019	16.25	SAFEGUARD		PINS
7/1/2019	16.25	SAFEGUARD		PINS
8/20/2019	2,000.00	SAFEGUARD		ATTB

8/20/2019	75.00	SAFEGUARD		PROP
8/29/2019	350.00	PUL54		ATTB
8/29/2019	181.00	PUL54		ATTC
5/21/2020	16.25	SAFEGUARD		PINS
6/24/2020	16.25	SAFEGUARD		PINS
7/2/2020	-276.25			PINS
7/15/2020	75.00	SAFEGUARD		PROP
7/15/2020	2,000.00	SAFEGUARD		PROP
7/23/2020	16.25	SAFEGUARD		PINS
8/27/2020	110.00	BOI90		PROP
9/23/2020	16.25	SAFEGUARD		PINS
10/21/2020	16.25	SAFEGUARD		PINS
	8,973.78			

# EXHIBIT C

**SCHER & ISENBERG, L.L.C.**  
**ATTORNEYS AT LAW**

200 HADDONFIELD-BERLIN ROAD  
HIGH RIDGE COMMONS, SUITE 200  
GIBBSBORO, NEW JERSEY 08026

Martin I. Isenberg\*  
Lynda M. Scher\*

\*ALSO ADMITTED IN  
Pennsylvania

(856) 782-8222  
FAX (856) 782-8825  
E-MAIL ADDRESS: [misenbergsq@comcast.net](mailto:misenbergsq@comcast.net)  
WEBSITE: [www.scherandisenberg.com](http://www.scherandisenberg.com)

PENNSYLVANIA OFFICE  
TWO PENN CENTR PLAZA  
SUITE 1020  
PHILADELPHIA, PENNSYLVANIA 19102

(215) 574-2010  
FAX (856) 782-8825

October 15, 2021

**Via Facsimile: 856-813-1720**

**Via Email: [rsaltzman@pbslaw.org](mailto:rsaltzman@pbslaw.org)**

Robert Saltzman, Esquire  
Pluese, Becker and Saltzman, LLC  
20000 Horizon Way, Suite 900  
Mount Laurel, New Jersey 08054

**RE: Laura Williams - Bankruptcy No. 18-10714**  
**416 Wesley Avenue, Pittman, New Jersey 08071**

Dear Mr. Saltzman,

As you know, I represent Ms. Laura Williams. Ms. Williams has brought to my attention a statement dated September 1, 2021, from Cenlar which I attach hereto.

It is Ms. William's understanding that she has paid in full the mortgage with Cenlar. Her Chapter 13 Plan called for her to pay the mortgage going forward and to pay the Trustee for back monies owed. Based on the Cenlar Statement, she has contributed \$14,108.50 to date to Cenlar and owes Cenlar another \$4,099.72.

Here is the inquiry-Has the mortgage been paid off with Cenlar and what only remains is the Plan payments? If this is the case, Ms. Williams will need to begin paying real estate taxes and homeowner's premiums as these will no longer be the responsibility of Cenlar. (If there is money in the escrow account this should be returned to Ms. Williams)

I also note that there have been corporate advances as of October 21, 2020 (see attached). Some of these large expenses relate to Property Preservation. What has been done to warrant a \$2,000.00 charge? My client has resided in this property for many years and has kept the property in good condition. I also see the \$16.50 monthly charges for property inspections but also see from the Cenlar Statement that this monthly expense or at least \$15.00 worth are tacked on to her mortgage every month. Are there double payments being assessed?

Page Two

October 15, 2021

RE: Laura Williams - Bankruptcy No. 18-10714 /

Kindly provide explanations as to the issues raised above so I may inform my client of her obligations.

Very truly yours,

A handwritten signature in cursive script, reading "Martin F. Isenberg".

Martin Isenberg, Esquire

MII/fad

Enclosure

cc: Laura Williams (via email)

# **EXHIBIT**

## **D**

**Frances Davis**

---

**From:** Laura Williams <lwilliams071967@gmail.com>  
**Sent:** Friday, November 12, 2021 11:23 AM  
**To:** Martin Isenberg; Martin Isenberg; Frances Davis  
**Subject:** Final Cenlar payment  
**Attachments:** FinalCenlarpayment.pdf

Hi Marty,

Please see attached a copy of my check/final payment that I am sending out today.

I also attached copies of my last three loan statements from August till November. On September 14th I paid a total of \$1,326.55, what I thought was my final payment. Then I received a statement dated 09/01/21 saying that I owed another \$400. This is when I contacted you and started asking questions.

Let me know if you need anything further from me.

thank you,  
Laura



PO Box 77404  
Ewing, NJ 08628  
STATEMENT ENCLOSED

## Loan Statement

\* 0564221 000001131 09CES1 0062530 Y2 1AF041 -D P1  
JOHN P WILLIAMS  
LAURA A WILLIAMS  
416 WESLEY AVE  
Pitman NJ 08071-2519



Statement Date: 08/02/21  
Account Number: 0039956651  
Payment Date: 09/01/21  
Payment Amount: \$1,326.55

### Contact Us

Customer Service/Pay By Phone: 800-223-6527

Website: [www.loanadministration.com](http://www.loanadministration.com)

\*Qualified Written Requests, notifications of error, or requests for information concerning your loan must be directed to PO Box 77423 Ewing NJ 08628

**Bankruptcy Message**  
Our records show that you are a debtor in bankruptcy. We are sending this statement to you for informational and compliance purposes only. It is not an attempt to collect a debt against you. If your bankruptcy plan requires you to send your regular monthly mortgage payments to the Trustee, you should pay the Trustee instead of us. Please contact your attorney or the Trustee if you have questions. If you want to stop receiving statements, write to us.

Account Information	
Property Address	416 WESLEY AVE PITMAN, NJ 08071-0000
Outstanding Principal	\$1,819.63
Interest Rate	8.7000%
Prepayment Penalty	NONE

### Explanation of Payment Amount (Post-Petition Payment)

Principal	\$0.00
Interest	\$0.00
Escrow (for Taxes and Insurance)	\$0.00
Other	\$0.00
<b>Regular Monthly Payment*</b>	<b>\$0.00</b>
Total Fees & Charges Since Last Statement	\$0.00
Past Unpaid Amount	\$1,326.55
<b>Total Payment Amount</b>	<b>\$1,326.55</b>

\*The payment amount does not include any amount that was past due before you filed for bankruptcy but may include amounts required pursuant to a court order in your bankruptcy case.

### Transaction Activity (07/02/2021 to 08/02/2021)

Date	Effective Date	Description	Charges	Payments
07/14/21	07/14/21	PARTIAL/UNAPPLIED PAYMT		\$1,100.00
07/21/21	07/21/21	PARTIAL/UNAPPLIED PAYMT		\$421.36
07/22/21		FEE - PROP PRESERVE	\$75.00	

### Past Payments Breakdown

	Paid Since Last Statement	Paid Year to Date
Principal	\$475.97	\$3,713.18
Interest	\$16.64	\$227.70
Escrow (Taxes and Insurance)	\$552.93	\$4,196.89
Other	\$0.00	\$0.00
+Fees	\$0.00	\$0.00
*Unapplied Funds	\$475.82	\$1,855.32
<b>Total</b>	<b>\$1,521.36</b>	<b>\$9,995.09</b>

### Important Messages

We may not have received all of your mortgage payment due since you filed for bankruptcy. This statement may not show recent payments you sent to the Trustee that the Trustee has not yet forwarded to us. Please contact your attorney or Trustee if you have questions.  
**\*Unapplied Funds:** Any partial payments included here are not applied to your mortgage, but instead are held in one or more separate suspense accounts. Once we receive funds equal to a full monthly payment, we will apply those funds to your mortgage.  
**+Fees -** If your Chapter 13 plan requires you to pay interest on the arrearage being paid through the plan, such interest amount shall be included in this section.

### Summary of Amounts Past Due Before Bankruptcy Filing (Pre-Petition Arrearage)

Paid Since Last Statement	\$421.36
Total Paid During Bankruptcy	\$13,687.23
Current Balance	\$4,521.08

This box shows amounts that were past due when you filed for bankruptcy. It may also include other allowed amounts on your mortgage loan. The Trustee is sending us the payments shown here. These are separate from your regular monthly mortgage payment.



See Reverse Side For Additional Important Information Please return this portion with your payment

Make Checks Payable To:

Y2

John P Williams  
Laura A Williams  
416 Wesley Ave  
Pitman NJ 08071-2519

Check this box if your address or  
personal information has been  
updated on the reverse of this  
payment coupon.



Account Number:  
0039956651

Amount  
Enclosed

\$

400.00

If your bankruptcy plan requires you to send your  
regular monthly mortgage payment to the Trustee,  
do not send your payment to us. Instead, you should  
send your payment to the Trustee.

Payment Date: 10/01/21  
Payment Amount: \$400.00

Please do not fold, tape or staple  
check or coupon.  
Please only use blue or black ink.

Additional Principal \$ \_\_\_\_\_  
Additional Escrow \$ \_\_\_\_\_  
Total Amount Enclosed \$ \_\_\_\_\_

\*See reverse side for payment information

PAYMENT PROCESSING CENTER  
PO BOX 11733  
NEWARK, NJ 07101-4733



0300000003995665100Y2NJ1500000000000000000000418200000309693000000004182

55-780-312

584

LAURA A. WILLIAMS  
416 WESLEY AVE  
PITMAN, NJ 08071

Date

11/12/21

Pay To

The Order Of

Cenlar

\$ 400.00

four hundred <sup>00</sup>/<sub>100</sub>

Dollars



Security Features  
Check for them

PNC BANK, N.A.  
NEW JERSEY 060

WITH GOD, ALL THINGS ARE POSSIBLE.

For 0039956651

Laura Williams MP

⑆031207607⑆ 8039481063⑆ 0584

# Loan Statement



PO Box 77404  
Ewing, NJ 08628

STATEMENT ENCLOSED

+ 0582104 000001206 09CES1 0062530 Y2 1AF041 -D P1

JOHN P WILLIAMS  
LAURA A WILLIAMS  
416 WESLEY AVE  
Pitman NJ 08071-2519



Statement Date: 10/01/21  
Account Number: 0039956651  
Payment Date: 11/01/21  
Payment Amount: \$400.00

## Contact Us

Customer Service/Pay By Phone: 800-223-6527

Website: [www.loanadministration.com](http://www.loanadministration.com)

\*Qualified Written Requests, notifications of error, or requests for information concerning your loan must be directed to PO Box 77423 Ewing NJ 08628

## Bankruptcy Message

Our records show that you are a debtor in bankruptcy. We are sending this statement to you for informational and compliance purposes only. It is not an attempt to collect a debt against you.  
If your bankruptcy plan requires you to send your regular monthly mortgage payments to the Trustee, you should pay the Trustee instead of us. Please contact your attorney or the Trustee if you have questions.  
If you want to stop receiving statements, write to us.

## Account Information

Property Address	416 WESLEY AVE PITMAN, NJ 08071-0000
Outstanding Principal	\$857.32
Interest Rate	8.7000%
Prepayment Penalty	NONE

## Explanation of Payment Amount (Past/Pending Payment)

Principal	\$0.00
Interest	\$0.00
Escrow (for Taxes and Insurance)	\$0.00
Other	\$0.00
<b>Regular Monthly Payment*</b>	<b>\$0.00</b>
Total Fees & Charges Since Last Statement	\$0.00
Past Unpaid Amount	\$400.00
<b>Total Payment Amount</b>	<b>\$400.00</b>

\*The payment amount does not include any amount that was past due before you filed for bankruptcy but may include amounts required pursuant to a court order in your bankruptcy case.

## Transaction Activity (09/02/2021 to 10/01/2021)

Date	Effective Date	Description	Charges	Payments
09/07/21	09/07/21	PARTIAL/UNAPPLIED PAYMT		\$421.36
09/13/21	09/13/21	PARTIAL/UNAPPLIED PAYMT		\$700.00
09/14/21	09/14/21	PARTIAL/UNAPPLIED PAYMT		\$625.55
09/23/21		FEE - BNKRPTCY ATTYFEE	\$50.00	
09/24/21		FEE - PROPERTY INSPECT	\$15.00	
09/28/21		HAZARD INSURANCE		\$1,125.71

## Past Payments Breakdown

	Paid Since Last Statement	Paid Year to Date
Principal	\$482.89	\$4,675.49
Interest	\$9.72	\$250.61
Escrow (Taxes and Insurance)	\$552.93	\$5,304.75
Other	\$0.00	\$0.00
+Fees	\$0.00	\$0.00
*Unapplied Funds	\$702.37	\$1,933.51
<b>Total</b>	<b>\$1,747.91</b>	<b>\$12,164.36</b>

## Important Messages

We may not have received all of your mortgage payment due since you filed for bankruptcy.  
This statement may not show recent payments you sent to the Trustee that the Trustee has not yet forwarded to us. Please contact your attorney or Trustee if you have questions.  
\*Unapplied Funds: Any partial payments included here are not applied to your mortgage, but instead are held in one or more separate suspense accounts. Once we receive funds equal to a full monthly payment, we will apply those funds to your mortgage.  
+Fees - If your Chapter 13 plan requires you to pay interest on the arrearage being paid through the plan, such interest amount shall be included in this section.

## Summary of Amounts Past Due Before Bankruptcy Filing (Pre-Petition Arrearage)

Paid Since Last Statement	\$421.36
Total Paid During Bankruptcy	\$14,529.95
Current Balance	\$3,678.36

This box shows amounts that were past due when you filed for bankruptcy. It may also include other allowed amounts on your mortgage loan. The Trustee is sending us the payments shown here. These are separate from your regular monthly mortgage payment.

**By: Martin I. Isenberg, Esquire**  
Atty ID No.: 000791987  
Scher & Isenberg, L.L.C.  
200 Haddonfield-Berlin Road  
High Ridge Commons – Suite 200  
Gibbsboro, New Jersey 08026  
Telephone: (856) 782-8222  
Facsimile: (856) 782-8825  
Email: [misenbergesq@comcast.net](mailto:misenbergesq@comcast.net)  
Attorney for Debtor, Laura Williams

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IN RE:	:	UNITED STATES BANKRUPTCY COURT
	:	DISTRICT OF NEW JERSEY
	:	
LAURA WILLIAMS	:	Case No.: 18-10714-JNP
	:	
	:	Judge: Jerrold N. Poslusny, Jr.
	:	
	:	Chapter 13

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**CERTIFICATE OF SERVICE**

I, Martin I. Isenberg, Esquire, hereby certify as follows:

1. The within Objection has been filed electronically via Electronic Case Filing with the United States Bankruptcy Court for the District of New Jersey; and

2. A copy of the within Objection has been sent via Electronic Case Filing and Email, to the following:

Rob Saltzman, Esquire  
Attorney for Mortgagee  
20000 Horizon Way, Suite 900  
Mt. Laurel, NJ 08054  
[rsaltzman@pbslaw.org](mailto:rsaltzman@pbslaw.org)

3. A copy of the within Objection has been sent via Electronic Case Filing and Regular Mail, to the following:

Isabel C. Balboa, Esquire  
Chapter 13 Standing Trustee  
Cherry Tree Corporate Center  
535 Route 38 – Suite 580  
Cherry Hill, NJ 08002

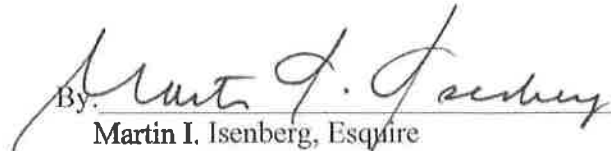
I hereby certify that the foregoing statements made by me are true to the best of my knowledge and belief. I am fully aware that if the foregoing statements made by me are willfully false, I am subject to punishment.

SCHER & ISENBERG, L.L.C.

Date:

11/15/2021

By:

A handwritten signature in cursive script, appearing to read "Martin I. Isenberg", written over a horizontal line.

Martin I. Isenberg, Esquire  
Attorney for Debtor, Laura Williams

**By: Martin I. Isenberg, Esquire**  
Atty ID No.: 000791987  
Scher & Isenberg, L.L.C.  
200 Haddonfield-Berlin Road  
High Ridge Commons – Suite 200  
Gibbsboro, New Jersey 08026  
Telephone: (856) 782-8222  
Facsimile: (856) 782-8825  
Email: [misenbergesq@comcast.net](mailto:misenbergesq@comcast.net)  
Attorney for Debtor, Laura Williams

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IN RE:	:	UNITED STATES BANKRUPTCY COURT
	:	DISTRICT OF NEW JERSEY
LAURA WILLIAMS	:	
	:	Case No.: 18-10714-JNP
	:	
	:	Judge: Jerrold N. Poslusny, Jr.
	:	
	:	Chapter 13

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**ORDER**

AND NOW this \_\_\_\_\_ day of \_\_\_\_\_, 2021, it is ORDERED that the Motion To Vacate Stay is hereby DENIED and/or Dismissed as Moot and that Cenlar be ordered to provide an accounting of monies owed by Debtor, Pre-Petition and full explanation as to charges Post-Petition.

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Honorable Jerrold N. Poslusny, Jr.

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

By: Martin I. Isenberg, Esquire  
Atty ID No.: 000791987  
Scher & Isenberg, L.L.C.  
200 Haddonfield-Berlin Road  
High Ridge Commons – Suite 200  
Gibbsboro, New Jersey 08026  
Telephone: (856) 782-8222  
Facsimile: (856) 782-8825  
Email: misenbergesq@comcast.net  
Attorney for Debtor, Laura Williams

In Re:

Laura Williams, Debtor

Case No.: 18-10714-JNP  
Chapter: 13  
Adv. No.: \_\_\_\_\_  
Hearing Date: \_\_\_\_\_  
Judge: Jerrold N. Poslusny

**CERTIFICATION OF SERVICE**

1. I, Martin I. Isenberg, Esquire :

☒ represent Debtor, Laura Williams in this matter.

☐ am the secretary/paralegal for \_\_\_\_\_, who represents  
\_\_\_\_\_ in this matter.

☐ am the \_\_\_\_\_ in this case and am representing myself.

2. On November 17, 2021, I sent a copy of the following pleadings and/or documents  
to the parties listed in the chart below.  
Motion for Reconsideration.

3. I certify under penalty of perjury that the above documents were sent using the mode of service  
indicated.

Date: 11/17/2021

Signature



Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Rob Saltzman, Esquire Attorney for Mortgagee 20000 Horizon Way, Suite 900 Mt. Laurel, NJ 08054 rsaltzman@pbslaw.org	Attorney for Creditor	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF and email</u> (As authorized by the Court or by rule. Cite the rule if applicable.)
Isabel C. Balboa, Esquire Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 – Suite 580 Cherry Hill, NJ 08002	Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)